

Pylypchuk, Sieglinde

From: Tyler, Kip
Sent: Friday, November 13, 2020 10:47 PM
To: Pylypchuk, Sieglinde
Subject: RE: Manna Fish Farms NY - BES
Attachments: Baseline Environmental Survey (BES) Guidance 10-24-2016.pdf

Follow Up Flag: Follow up
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Hi Siegie.

It was good catching up this morning. Below are the items that we discussed that you may want to consider for the BES plan.

- **Pre-Survey Meeting:** I highly recommend a pre-survey meeting with the applicant, the permitting agencies (EPA, USACE), the consultation agencies (NMFS and USFWS). I also recommend getting the state SHPO involved as they will be handling the NHPA perspective. Consider including BOEM - I have found them to be really helpful in our Region.

The purpose of the pre-survey meeting is to ensure that the information collected meets all permitting and authorization agency requirements, and serves as an opportunity to address potential issues in advance of performing the BES. The pre-survey meeting also provides a chance for the federal agencies to share existing information regarding known historic properties and the results of previous surveys or environmental studies of relevance to an applicant's project area, if available. You may want to document any concerns with the BES plan (i.e. buffer requirement) in writing after the pre-survey meeting.
- **USACE Input:** It's important to get input from the USACE so that the BES is conducted in a manner that will yield sufficient information for the Section 10 permit.
- **Other Evaluations and Consultations:** You may want to engage with your NEPA and ODC colleagues. The information collected in the BES will serve many purposes throughout the permit process such as the creation of an EA/EIS, ODC evaluation, and all of the consultations (EFH, ESA, CZMA, NHPA)
- **Buffer:** The draft plan mentions that it was based on the Gulf BES guidance which has a 500 meter buffer requirement. We increased the buffer to 1,000 meters so that the boundaries of an aquaculture site must be a minimum of 1,000 meters from biologically sensitive features (e.g., coral, hard bottom habitat, etc.) or historic properties to provide a protective buffer from construction related activities and operational discharges. It's highly recommended to survey a larger area of seafloor than is needed to in the event that the proposed site contains sensitive features that prohibit siting or cause the site to be relocated nearby. The 1,000 meter buffer is consistent with our Oil and Gas permit in the gulf; however, a larger buffer could be needed for commercial scale aquaculture facilities depending on the facility placement (depth, current, direction). The buffer requirement could be supported by depositional modeling.
- **Contingency Plan:** The applicant should have a contingency plan. The applicants should be strongly encouraged to utilize equipment and methods that allows for real-time review of potentially sensitive areas to enable alternative site selection while the survey is being conducted. This recommendation is intended to prevent the need for multiple surveys and reduce the timeline needed for permitting actions.
- **Professional Certification:** The current and revised Gulf BES guidance has a professional certification requirement. The BES plan and final report should be prepared and signed by a professional marine archaeologist and marine biology experts who have experience in conducting surveys, and processing and interpreting the resulting data for archaeological and biological potential. The plan and survey must also conform the SHPO's procedures so that data are collected to meet requirements for marine archeological surveys.
- **Survey Spacing:** The survey spacing is shown to have 100% coverage, which does not give sufficient overlap. The revised Gulf BES Guidance will likely require that the spacing be set so that sonar tracks overlap sufficiently to obtain 150-200% coverage of the seafloor surface.

- **Hydrological Info:** The duration of hydrological study is on the minimal end (21 days). While 21 days is in line with our currently effective BES, I recommend a 30-90 day range to collect current data that may provide seasonality and min/max currents. You can consider accepting nearby buoy data that has a longer historical data set if it is appropriately representative.
- **Water Quality:** The draft BES plan introduction discusses collecting water quality information (nutrients, dissolved oxygen levels, as well as plankton diversity and relative abundance). I did not see any detailed information about the water quality sampling later in the plan such as duration of sampling, nutrient parameters, sampling locations, sampling methods, etc.

I hope all of this is clear and helpful. Let me know if you have more questions or if you want to talk further.

Attached is the current Gulf BES guidance that is being revised. Please forward along the SnapperFarm fact sheet when you get a chance.

Kip Tyler | Environmental Engineer
U.S. EPA Region 4 | Permitting and Grants Branch
Atlanta Federal Center – MC 9T25 | 61 Forsyth Street SW | Atlanta GA 30303-8960
w 404.562.9294 | m 404.323.6094 | Tyler.Kip@epa.gov

From: Pylypchuk, Sieglinde <Pylypchuk.Sieglinde@epa.gov>
Sent: Tuesday, November 3, 2020 8:25 AM
To: Tyler, Kip <Tyler.Kip@epa.gov>
Subject: RE: Manna Fish Farms NY - BES

That sounds great. Thanks!

Sieglinde Pylypchuk
NPDES Section
EPA Region 2
pylypchuk.sieglinde@epa.gov
212-637-4133
Schedule: Monday, Wednesday & Thursday. 8:00-4:30.

From: Tyler, Kip <Tyler.Kip@epa.gov>
Sent: Friday, October 30, 2020 4:52 PM
To: Pylypchuk, Sieglinde <Pylypchuk.Sieglinde@epa.gov>
Subject: RE: Manna Fish Farms NY - BES

Hi Siegi. I'm still reviewing it. Is that ok? Lets talk next week on wed or thurs.

Kip Tyler
w 404.562.9294 | m 404.323.6094

From: Pylypchuk, Sieglinde <Pylypchuk.Sieglinde@epa.gov>
Sent: Thursday, October 29, 2020 4:05 PM
To: Tyler, Kip <Tyler.Kip@epa.gov>
Subject: RE: Manna Fish Farms NY - BES

Hi Kip -

I'm just looping back around on this. Please let me know if I can provide anymore info or if you need anything else.

Thanks,

Siegi

Sieglinde Pylypchuk

NPDES Section

EPA Region 2

pylypchuk.sieglinde@epa.gov

212-637-4133

Schedule: Monday, Wednesday & Thursday. 8:00-4:30.

From: Tyler, Kip <Tyler.Kip@epa.gov>

Sent: Thursday, October 15, 2020 8:51 AM

To: Pylypchuk, Sieglinde <Pylypchuk.Sieglinde@epa.gov>

Cc: Molloy, Jennifer <molloy.jennifer@epa.gov>

Subject: RE: Manna Fish Farms NY - BES

Hey Seigi.

I would be happy to take a look at the BES plan. Can I get back to you by Monday?

Kip Tyler

w 404.562.9294 | m 404.323.6094

From: Pylypchuk, Sieglinde <Pylypchuk.Sieglinde@epa.gov>

Sent: Wednesday, October 14, 2020 3:49 PM

To: Tyler, Kip <Tyler.Kip@epa.gov>

Cc: Molloy, Jennifer <molloy.jennifer@epa.gov>

Subject: Manna Fish Farms NY - BES

Hi Kip –

I'm hoping to tap into your aquaculture knowledge regarding the plan for Manna Fish Farms Baseline Environmental Study.

Late last month, we had a pre-application with the Manna, the Corps, BOEM, NMFS, USCG, NCCOS, etc. We were provided with the NCCOS Siting Analysis and a BES Plan for discussion (attached). I am still learning the aquaculture ropes and, while the BES Plan looks reasonable to me, I'm not quite sure what I should be looking for. Jenny advised that you were well versed in BESs and suggested I reach out for your thoughts as well. Is there anything specific I should be looking for when reviewing this? Any major red flags to keep an eye out for?

Manna is hoping to conduct their field work in the Spring but I am heading out on maternity leave in December/January so I'd like to determine if EPA has any concerns and convey them to Manna in the coming weeks.

I welcome any advice and thoughts you can share with me.

Thanks,

Siegi

Sieglinde Pylypchuk
NPDES Section
EPA Region 2
pylypchuk.sieglinde@epa.gov
212-637-4133

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